

Dealing Fairly With Non-CAPTE Graduates

Jurisdictions have an obligation to ensure that all physical therapists and physical therapist assistants meet the requirements for licensure and are safe and competent in their practice. However those regulatory requirements should not create unnecessary licensure barriers preventing qualified people from entering the workforce either initially or when moving from state to state.

With this in mind, the Federation of State Boards of Physical Therapy (FSBPT) Foreign Educated Standards Committee (FES) has been extremely busy exploring, researching, and making recommendations on issues related to physical therapists and physical therapist assistants that have graduated from educational programs that are not accredited by the Commission on Accreditation in Physical Therapy Education (CAPTE).

Framework for Considering the non-CAPTE Graduate's Experiences in Licensing

The FES began exploring post-graduate professional experiences as a component of a licensure review process in early 2014. As a step toward licensure, physical therapists and physical therapist assistants who did not graduate from CAPTE-accredited educational programs must undergo a review of educational credentials in order to determine substantial equivalency to the CAPTE graduate. The educational credentials review process is a comparison of the individual PT or PTA applicant's education to the United States standards for the first professional degree of a PT or PTA as required by the individual jurisdiction. Graduates of programs that are not CAPTE accredited often present with educational deficiencies in areas where experience may be a viable alternative to demonstrating content in the area. Examples of didactic deficiencies that could be met by experience are shown below.

DIDACTIC DEFICIT	EXPERIENCE
Diagnosis	Worked as direct access practitioner in home country
Cultural Competence	Volunteered for an international aid agency
Integumentary/Wound Care	Attained Wound Care Certification (WCC)

Although a jurisdiction may wish to take post-graduate experiences into consideration for licensure purposes, credentialing agencies typically review post-secondary education to determine equivalency for PTs and PTAs and do not include an evaluation of work experience or a review of continuing education taught outside of the college or university system. Post-graduate professional experiences may include, but are not limited to: paid work as a physical therapist or physical therapist assistant, continuing competence activities, volunteer work, academic coursework, publication, residencies/internships and supervised clinical practice. Currently, when deficiencies are found in the education, an individual must satisfy those deficiencies by supplementing past education with additional college or university coursework. There are two exceptions to this rule: 1) emergency procedures requirement and 2) the use of Supervised Clinical Practice hours to meet the hours of clinical education requirement.

The following motion from the 2014 FSBPT Delegate Assembly demonstrates the membership's interest in using professional experience as part of the licensure decision when educational deficiencies have been noted.

Motion DEL-14-03

To support the Board of Directors' exploration of tools to evaluate post-graduate/ professional experience of foreign educated physical therapists in order to assess their readiness to practice in the United States.

Domestic and international institutions of higher education both have programs allowing an individual to earn academic credit for learning from experience. Typically, there are a minimum number of years required in relevant, verifiable work experience. Students may be required to demonstrate that the knowledge and skills they have acquired in the work place or through life experiences are equivalent to those gained in an academic course. No examples of academic credit for life experiences were found in entry-level Doctor of Physical Therapy education programs, however, many transitional Doctor or Physical Therapy (tDPT) programs allow for this practice. Internationally, recognition of prior learning is the process by which a person's skills and knowledge gained from sources outside the traditional, accredited classroom are evaluated to determine his/her competence in a given area. Recognition of prior learning is formalized in many countries including the UK, Australia, New Zealand, Canada, South Africa, and France for a variety of professions and is often, but not solely, used as a means to grant academic credit. The individual may present information on volunteer work performed, paid or pro bono employment, as well as other related experiences. The information is provided by the individual in a format that will support the claim he/she is making that they are competent when compared to a set of standards or expectations.

One vehicle to demonstrate prior learning is the professional portfolio. Development and management of a professional portfolio is required for multiple health professions in the UK and Canada. The portfolio is a tool to convey the experiences, skills, and knowledge that has been acquired over time. If criteria and standards are created, an individual could use the information in his/her portfolio to demonstrate meeting the competencies, or in the case of a credentials review, a content area. A

following example demonstrates how a portfolio could be used to map evidence against a specific credentials review deficit.

Portfolio evidence mapped to content deficit

Content Area Deficit from Credentials Review: orthopedics

Competence Demonstrated by: Ten years as head physical therapist and sports medicine director for Nigerian national soccer team.

Evidence of Competence from portfolio:

Sports Injury Management Residency completed in Australia 2011
2005-2015 International continuing education courses (multiple) topics: manual therapy, therapeutic exercise, functional training, sport specific training, strength and conditioning
2013 Invited speaker on injury prevention at the International Association of Football

Perhaps the greatest challenge to recognizing experience(s) to meet a content deficit is the lack of formal curriculum and competency standards for these experiences. Without formal curriculum or prescribed outcomes, it becomes very difficult to set the criteria that need to be met or the assessment methodologies required. Post-graduate experiences vary from applicant to applicant, however the goal must be to maximize consistency from one applicant to the next. Indeed, variation among jurisdictions must also be considered. If there are multiple standards in place for what meets a content deficit, barriers to mobility are created. Experiences allowed by one jurisdiction but no others may inhibit a licensee's ability to move and continue practice without needing to fulfill additional requirements.

Another challenge is identifying which deficiencies are appropriate to be made up with professional experiences and the most appropriate entity to review these experiences. Just as importantly, after the deficiencies are identified, it must be determined exactly what experiences and professional development would be appropriate to remediate the deficiencies. The most appropriate entity to review professional experiences must be identified. Credentialing agencies employ educational credentials reviewers; these individuals are skilled and trained to review and evaluate academic documents, not non-academic experiences.

Finally, the question should be raised as to how these experiences would be authenticated. Currently, in a credentials review, some applicants attempt to submit false documentation from known institutions. Post graduate experiences may pose even greater difficulty securing the proper level of background documentation or defining and then identifying what are primary source documents.

If a licensing board determines that experience may be used in meeting the educational deficits of non-CAPTE graduates, the FES would encourage Boards at this time to consider accepting post-graduate experiences such as those listed below, as a means for non-CAPTE graduates to demonstrate their abilities in the deficient areas and fitness to practice.

Residency in physical therapy

Criteria: Residency accredited by the American Board of Physical Therapy Residency and Fellowship Education (ABPTRFE). For a list of current programs: http://www.abptrfe.org/home.aspx

Fellowship in physical therapy

Criteria: Fellowship accredited by the American Board of Physical Therapy Residency and Fellowship Education (ABPTRFE). For a list of current programs: http://www.abptrfe.org/home.aspx

Board Certification

Criteria: Board-certification by American Board of Physical Therapy Specialties (ABPTS). For a list of current specializations: http://www.abpts.org/home.aspx

Teaching that Content Area in a CAPTE-accredited program

Criteria: Currency- how recently did they teach the material; on faculty vs. guest lecturer; CAPTE-accredited program; syllabus or course description; number of times they've taught the material. For a list of current CAPTE accredited programs: www.CAPTEonline.org

Publications

Criteria: Peer-reviewed publications. Recommend that publications be 'current' – e.g., Five years or less. Must be related to specific content area that is missing/deficient.

- Active practice/active work Exemption: Active physical therapist practice or work as a physical therapist assistant in a United States jurisdiction, of not fewer than 1,000 hours per year, in 3 of the last 5 years. Licensee must provide verification of active practice/active work which may include:
 - Employer verification of employment
 - Records of billing, patient treatment
 - Other, as approved by the Board

The FES continues to explore ways to expand the use of experience to meet deficits on a credentials review.

Facilitating Licensure by Endorsement of Graduates from non-CAPTE Educational Programs

PTs and PTAs from non-CAPTE accredited educational programs currently holding a license in a US jurisdiction, regardless of how long they've been licensed or worked in the USA, are often faced with burdensome and time-consuming requirements when attempting to become licensed by endorsement in another jurisdiction. Often, the licensure process is delayed while the PT/PTA is required to repeat steps that were completed for the initial US license.

To facilitate the licensure of qualified, licensed PTs and PTAs from other jurisdictions, the FES Committee recommends the following elements be addressed in endorsement regulation for PTs/PTAs that graduate from a non-CAPTE accredited program:

- All requirements for endorsement required of CAPTE applicants (other than CAPTE education) in addition to minimal specific requirements, should also apply to non-CAPTE accredited program graduates. For clarity, jurisdictions should list all endorsement requirements for non-CAPTE applicants in one comprehensive list within statute or regulation rather than in separate sections.
- 2. Credentials Review: If a physical therapist/physical therapist assistant was evaluated and found to be equivalent *using the most current Coursework Tool* at the time of his/her licensure in a jurisdiction, then a re-evaluation of credentials is not necessary and should not be required. The board where endorsement licensure is sought should receive a copy of the initial evaluation from the licensing board or the credentialing agency that performed the credential evaluation.
- 3. TOEFL: The individual should provide verification that a passing score was achieved on the TOEFL (if applicable) at the time of the initial, first licensure in the United States. This requirement would be waived for the applicant who meets the active practice/active work exemption below.
- 4. Supervised Clinical Practice (for PT) or Supervised Clinical Work (for PTA): A verification that a PT or PTA has completed a supervised clinical practice/ supervised clinical work in a jurisdiction as a requirement for licensure. The jurisdiction in which the supervised clinical practice/supervised clinical work was completed shall send verification to the jurisdiction where endorsement licensure is sought including:
 - Number of hours completed under supervision
 - Qualified supervisor- licensed PT or PTA (PTA may not supervise a PT)
 - Facility approved by the board
 - Performance was evaluated (Performance Evaluation Tool (for PTs) or other)

This requirement would be waived for the applicant that meets the active practice/active work exemption below.

5. Verification of completion of educational coursework including an assessment, offered by a US accredited institution, on the United States Healthcare System. This requirement would be waived for the applicant who provides verification of a completed supervised clinical practice/ supervised clinical work above or meets the active practice/active work exemption below.

The FES Committee encourages jurisdictions to review their current requirements for those licensees that are non-CAPTE graduates, who have received and maintained an unencumbered license in a US

jurisdiction. These licensees, with a proven history of practice in another US jurisdiction, are assets to increase the size of the physical therapy workforce in the state.

Jurisdictions must keep the mission of public protection top of mind when evaluating each requirement for licensure and determine which are necessary for public protection versus creating unnecessary barriers and preventing qualified people from entering practice. Promoting safe and effective practice is the ultimate goal for all licensing boards in any decision made.

This report was written based on the work of FSBPT's Foreign Educated Standards Committee, consisting of the following people:

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